

The Fidelis Partnership Service Company Privacy Notice for US Residents

Last edited: October 2025

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Summary

The Fidelis Partnership is a global (re)insurance managing general underwriting group. The Fidelis Partnership ("The Fidelis Partnership," "we," "our," or "us") is committed to protecting the privacy and security of suppliers, customers, individuals who use our website, or individuals who otherwise have dealings with us ("you" or "your"). We want you to understand how we collect and use personal data that we collect from The Fidelis Partnership website, and any affiliated domains or sub-domains (collectively, the "Site"), and all related services (together with the Site, the "Services"). By using the Services, you accept and agree to the practices this Privacy Policy describes. If you do not agree to any of the terms in this Privacy Policy, you should not use the Services.

This privacy notice does not apply to employees of The Fidelis Partnership or to situations where you are dealing with our insurance intermediary entities in The Fidelis Partnership directly.

The Fidelis Partnership may make amendments to this privacy notice from time to time, including to reflect changes in our processing activities and changes in the law. Where we make any substantive changes to this privacy notice, we will notify you of these changes by email.

The Fidelis Partnership is comprised of a number of separate legal entities, each of which may collect, control, or process your personal data in different circumstances, depending on the interaction you have with us or on the re(insurance) policy we have intermediated on behalf of our capacity providers.

If you are a supplier, an employee of one of our brokers receiving marketing or entertainment from us, or a business contact then Fidelis Marketing Limited, Pine Walk Capital Limited, Pine Walk Europe SRL or one of our appointed representatives will be the controller of any personal data that you provide to us.

If you are a broker, policyholder or other third party then one of the following will be the data controller(s) of your personal data and our [Insurance and Underwriting Privacy Notice](#) will apply to you:

- Pine Walk Capital Limited; and/or
- Pine Walk Europe SRL; and/or
- Shelf Opco Bermuda Limited; and/or
- One of our appointed representatives.

For details on our use of cookies on our website, please see our [Cookie Policy](#).

What Information Do We Collect?

Personal data is information in the possession or control of The Fidelis Partnership that relates to you and either identifies you on its own or is information that can be used to identify you when used in combination with other data we hold. When you use our Services, we may collect, store, and process various kinds of data, including personal data about you.

Specifically, may process the following categories of personal data:

- Individual contact details, such as names, postal and email addresses, telephone numbers;
- Identification details, such as dates of birth and registration numbers (including passports/national insurance numbers);
- Information on your preferences and interests; and
- Your browsing behavior whilst on our website through the use of cookies.

If you contact us we may also collect the following information:

- name and job title;
- contact information including email address;
- demographic information such as postcode and preferences;
- other information relevant to our services;
- other information relevant to your services or products;
- details of any complaint you have, how it was investigated and resolved and details of any compensation paid; or
- any other information you may provide.

In addition to collecting information directly from you, we may also collect information from other sources such as:

- sanctions checking services;
- sources which are publicly available such as internet search engines, news articles and social media sites; or
- our other businesses in The Fidelis Partnership.

We may also collect details of your visit to our Services and the pages you access, including, but not limited to, traffic data, location data, weblogs and other communication data, including your IP address, browser type, the date and time you accessed or left the Services, and which pages you viewed. Some parts of our Services use cookies and other technologies to collect this information about your general internet usage. See our Cookie Policy to learn more.

What We Do With Your Data

We may use your personal data for the following purposes:

- to administer our products and services and facilitate transactions;
- to receive the service or product you're providing;
- to verify your identity for the provision of a product or service which you are supplying to us;

- for the purposes of responding to a request to exercise data subject rights;
- to manage our relationships with you and with our business partners;
- to manage our procurement process, any products or services we need for our operations and relationship with our suppliers;
- to market our services and products to you;
- to understand and respond to customer feedback;
- to understand the way people use our services and products so we can improve them;
- to assess and analyze our market, customers, products and services;
- to process payments and pursue and collect outstanding monies owed to us;
- to manage any disputes or claims, and take legal advice;
- for the apprehension and prosecution of offenders;
- to monitor for fraud and for the prevention or detection of crime;
- to manage our business generally, including dealing with our insurers, auditors, lawyers and other professional advisers;
- to analyze by means of cookies and similar technologies to enhance performance of our website and advertising; or
- to comply with our legal obligations.

We may process data concerning your health (a form of special category data) where it is necessary for the purposes of our substantial public interest, for example:

- for preventing or detecting unlawful acts; or
- to manage legal claims.

Very rarely, we may process such data where it is necessary to protect your life.

It is also possible that we will on occasion process special categories of personal data about you, where you expressly provide it or when this is inferred from data you provide to us, e.g. where you include it in any messages you send to us in relation to a complaint or query. Please avoid providing us with any special categories of personal data, such as that related to health, race, ethnicity or religion, other than when it is strictly required.

We will only process criminal conviction or offense data in limited circumstances, such as for the prevention or detection of unlawful acts or for the purposes of defending legal claims. The processing of this data will be carried out in compliance with applicable data protection legislation on public security and terrorism prevention.

Retention of Your Data

The Fidelis Partnership keeps personal data for a limited period. We will retain your personal data only for as long as is necessary to fulfil the purposes for which the information was collected, or as required by law.

We may also keep your personal data where necessary to establish, exercise or defend legal claims or to comply with our legal or regulatory obligations, but for a limited period and only for so long as is necessary for such purposes.

Should you require additional information regarding our retention periods for personal data please contact us at the details set out in the "Contact us" section below.

How Do We Share Your Personal Data?

We may share your personal data with a number of third parties in order to effectively run our business, assist with our compliance with laws and regulations, or to receive expert advice.

We may share your personal data with the following categories of organization:

- other companies in The Fidelis Partnership group for our general business purposes or where services are shared between our group;
- third party service providers/companies that provide services for us on our behalf, including IT services and mailing services, payment services, website hosting and SMS sending providers;
- our software providers who may use your information to provide you with the services you request, analyze and assess their market, customers, products and services;
- government agencies and departments and statutory and regulatory bodies where lawfully permitted or required or to verify or enforce compliance with the policies and terms governing our services;
- law enforcement authorities, including the police;
- our professional advisers, such as accountants, law firms, auditors and insurers;
- fraud prevention agencies and debt collection agencies; or
- prospective sellers, buyers or other third parties involved in the transfer, sale, reorganization or merger of our business.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Links to Other Websites

Our website may contain links to other websites that may be of interest to you. However, once you have used these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy statement applicable to the website in question.

Marketing

You may choose to restrict the collection or use of your personal data for marketing purposes. If you have previously provided us with your personal data for marketing purposes, you may change your mind and stop receiving marketing at any time by writing to or emailing us at dataprotection@fidelispartnership.com.

Users Only of Legal Age of Majority

Our Services are not intended for children under 13 years of age. We do not knowingly collect personal data from children under 13. If you are under 13, do not use or provide any information on this Services or on or through any of its features/register on the Services or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or username you may use. If we learn we have collected or received personal data from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13 without verifiable parental consent, please contact us at dataprotection@fidelispartnership.com.

Contact us

If you wish to request the details of any personal data we hold on you, or wish to exercise any of your data protection rights, please write to us at Data Protection, Fidelis Marketing Limited, 22 Bishopsgate, 42nd Floor, London, EC2N 4BQ or email us at dataprotection@fidelispartnership.com.

California Visitors

The Fidelis Partnership is committed to complying with applicable laws, including the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA). This Section explains how we collect, use, and disclose personal data and describes rights you may have relating to your personal data under applicable state law. This Notice should be read in conjunction with our Privacy Policy for US residents.

Collection of Personal Data

We may collect the personal data categories listed in the table below.

Types of Personal Data	Source	Disclosed
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers.	Directly from you, indirectly from you, or from third parties.	We may disclose this information in accordance with our Privacy Policy.
Categories of Personal Information described in Cal. Civ. Code § 1798.80(e), such as name, signature, physical characteristics or description, address, telephone number, bank account number, credit card number, debit card number, or any other financial information.	Directly from you or from third parties.	We may disclose this information in accordance with our Privacy Policy.

Characteristics of protected classifications under state or federal law, such as age, citizenship, and sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions).	Directly from you or from third parties.	We do not disclose.
Audio, electronic, visual, thermal, olfactory, or similar information.	Directly from you or from observing your actions during a recorded meeting.	We do not disclose.
Professional or employment-related information	Directly from you or from third-party sources.	We may disclose this information in accordance with our Privacy Policy.
Internet or other electronic network activity information, such as browsing history, search history, and information regarding a website visitor's interaction with an internet website, application, or advertisement.	Indirectly from you. For example, from observing your actions on our Site.	We may disclose this information in accordance with our Privacy Policy.

We do not collect any sensitive personal information.

Personal data does not include: publicly available information lawfully made available from government records, deidentified or aggregated consumer information, or information excluded from applicable law.

We do not sell or share your identifiable personal data.

Business Purpose for Collecting Personal Data

Our Business Purpose is described in the Section “**What We Do With Your Data**” in our Privacy Policy.

We will not collect additional categories of Personal Information or use the Personal Information we collect for material different, unrelated, or incompatible purposes without providing you with notice.

Your Rights

Access

You may have the right to access personal data that we may collect or retain about you. If requested, we shall provide you with a copy of your personal data which we collected as permitted by the applicable law.

You also have the right to receive your personal data in a structured and commonly used format so that it can be transferred to another entity (“data portability”).

You may have the right to request that we disclose the following about your personal data, as defined by applicable law:

- The specific personal data we have collected;
- The categories of personal data we have collected;
- The categories of sources from which we have collected your personal data;
- The business purpose(s) for collecting or sharing your personal data;
- The categories of personal data we disclosed for business purposes; and
- The categories of third parties to whom we disclosed your personal data.

Opt-Out/Do Not Sell My Personal Data

You may have the right to opt-out of sharing your personal data with third parties for some purposes, including sharing that may be defined as a sale under applicable laws. You can opt-out of this sharing by emailing us at dataprotection@fidelispartnership.com.

The Fidelis Partnership does not use curtailed automated decision-making technology.

Do Not Share or Disclose My Sensitive Personal Data

You have the right to limit how we use and disclose sensitive personal data to purposes specifically permitted under applicable Data Protection Law. We do not collect any sensitive personal information.

Deletion

In certain circumstances, you may have the right to request that we delete any of your personal data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (instructions and description below), we will delete, and, as applicable, direct our service providers to delete, your personal data from our records, unless an exception applies.

We may deny your request to delete your personal data if retaining the information is necessary for us or our service providers, subject to certain exemptions.

Correct/ Rectification

In certain circumstances, you may have the right to request correction of any inaccurate personal data. Upon verifying the validity of a valid consumer correction request, we will use commercially reasonable efforts to correct your personal data as directed, taking into account the nature of the personal data and the purposes of maintaining your personal data.

Non-Discrimination

We will not discriminate against you for exercising any of your rights under applicable law.

California Visitors

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please send an email to dataprotection@fidelispartnership.com.

How to Exercise Your Rights

To exercise your rights, please email dataprotection@fidelispartnership.com or call

+44 203 846 6060